

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:

THE GATEWAY VENTURES, LLC,

Debtor.

§
§
§
§
§

Case No. 21-30071-hcm
Chapter 11

**SURESH KUMAR'S OBJECTION TO MOTION
FOR ORDER AUTHORIZING (I) SALE OF LOT 9 FREE AND CLEAR OF ALL
LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS, (II) PAYMENT OF CERTAIN
EXPENSES AT CLOSING, AND (III) RELATED RELIEF**

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Comes now Suresh Kumar ("Kumar") an unsecured creditor in the above styled and numbered bankruptcy case, and files this, his Objection to Motion for Order Authorizing (I) Sale of Lot 9 Free and Clear of All Liens, Claims, Encumbrances, and Interests, (II) Payment of Certain Expenses at Closing, and (III) for Related Relief (the "Motion to Sell"), and would respectfully show the Court as follows:

1. Kumar objects to the proposed sale because the Motion to Sell does not disclose the proposed sales price, so the creditors do not know if it is fair and reasonable.
2. Kumar reserves the right to supplement or amend this Objection.

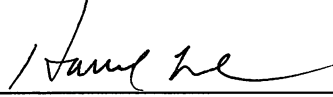
WHEREFORE, PREMISES CONSIDERED, Suresh Kumar respectfully requests the Court deny the Motion to Sell and that the Court grant him such other and further relief as is just.

DATED this 24th day of May, 2021.

Respectfully submitted,

GORDON DAVIS JOHNSON & SHANE P.C.


4695 N. Mesa Street
El Paso, Texas 79912
(915) 545-1133
(915) 545-4433 (Fax)

By: 

Harrel L. Davis III
State Bar No. 05567560
hdavis@eplawyers.com
Attorneys for Suresh Kumar

CERTIFICATE OF SERVICE

I certify that on the 24th day of May, 2021, a true and correct copy of the above and foregoing was served upon the attached list of parties via electronic means as listed on the court's ECF noticing system or by regular first-class mail:


Harrel L. Davis

Label Matrix for local noticing

0542-3

Case 21-30071-hcm

Western District of Texas

El Paso

Mon May 24 11:06:25 CDT 2021

Ashish Nayyar

806 Rockport Lane

Allen, TX 75013

Border Demolition

Attn: Bonnie Solis

1004 Diesel Drive

El Paso, TX 79907-3100

Deepesh Shrestha

c/o James M. Feuille

ScottHulse PC

P.O. Box 99123

El Paso, TX 79999-9123

HD Lending LLC

6080 Surety Dr. Ste 101

El Paso, TX 79905-2066

Internal Revenue Service

Special Procedures Staff - Insolvency

P. O. Box 7346

Philadelphia, PA 19101-7346

Rahim Noorani

4312 Hopi Drive

Carrollton, TX 75010-1133

Saleem Makani

c/o Eric W. Wood

Brown Fox PLLC

5550 Granite Parkway, Suite 175

Plano, Texas 75024

Email: eric@brownfoxlaw.com 75024-3834

Suhail Bawa

c/o Eric W. Wood

Brown Fox PLLC

5550 Granite Parkway, Suite 175

Plano, Texas 75024

Email: eric@brownfoxlaw.com 75024-3834

Texas Attorney General

Environmental Protection Division

P.O. Box 12548

Austin, TX 78711-2548

The Gateway Ventures, LLC

c/o PDG Prestige, Inc.

780 N Resler Drive, Suite B

El Paso, TX 79912-7196

Ashish Nayyar

c/o James M. Feuille

ScottHulse PC

P.O. Box 99123

El Paso, TX 79999-9123

City of El Paso

c/o Don Stecker

112 E. Pecan St. Suite 2200

San Antonio, TX 78205-1588

Depcesh Shrestha

3708 N. White Chapel Blvd.

Southlake, TX 76092-2042

HD Lending LLC

c/o Stephen H. Nickey PC

1201 North Mesa Ste. B

El Paso, TX 79902-4000

Michael Dixon

780 N. Resler Drive Suite B

El Paso, TX 79912-7196

Rahim Noorani

c/o James M. Feuille

ScottHulse PC

P.O. Box 99123

El Paso, TX 79999-9123

Saleem Makani

c/o Eric Wood (Brown Fox)

8111 Preston Rd. Ste 300

Dallas, TX 75225-6329

Suhail Bawa

c/o Eric Wood (Brown Fox)

8111 Preston Rd. Ste 300

Dallas, TX 75225-6329

(p)TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

ATTN BANKRUPTCY PROGRAM

P O BOX 13087

MC 132

AUSTIN TX 78711-3087

U.S. BANKRUPTCY COURT

511 E. San Antonio Ave., Rm. 444

EL PASO, TX 79901-2417

Ashish Nayyar, Rahim Noorani,

Deepesh Shrestha, and Umesh Shrestha

c/o James M. Feuille

201 E. Main Drive, Suite 1100

El Paso, TX 79901-1340

Comptroller of Public Accounts

C/O Office of the Attorney General

Bankruptcy - Collections Division MC-008

PO Box 12548

Austin TX 78711-2548

El Paso County Tax AC

301 Manny Martinez Dr., 1st Floor

El Paso, TX 79905-5503

HD Lending, LLC

c/o Clyde A. Pine, Jr.

Mounce Green Myers

P.O. Box 1977

El Paso, Texas 79999-1977

PDG Prestige, Inc.

780 N. Resler Drive Suite B

El Paso, TX 79912-7196

Rahim Noorani, et al.

c/o Marty D. Price

2514 Boll St.

Dalals, TX 75204-2512

Spectrum Gulf Coast, LLC

c/o Thompson Coburn LLP, Attn: Brian Hoc

One U.S. Bank Plaza, Suite 2700

St. Louis, MO 63101-1616

Suresh Kumar

c/o Harrel Davis

PO Box 1322

El Paso, TX 79947-1322

Umesh Shrestha

8505 Revenue Way

North Richland Hills, TX 76182-7431

Umesh Shrestha
 c/o James M. Feuille
 ScottHulse PC
 P.O. Box 99123
 El Paso, TX 79999-9123

Union Gateway, LLC
 c/o Ryan Little
 P. O. Drawer 1977
 El Paso, Texas 79999-1977

United States Trustee - EP12
 U.S. Trustee's Office
 615 E. Houston, Suite 533
 P.O. Box 1539
 San Antonio, TX 78295-1539

Westar Investor Group LLC
 c/o Eric Wood (Brown Fox)
 8111 Preston Rd. Ste 300
 Dallas, TX 75225-6329

Westar Investors Group, LLC
 c/o Eric W. Wood
 Brown Fox PLLC
 5550 Granite Parkway, Suite 175
 Plano, Texas 75024
 Email: eric@brownfoxlaw.com 75024-3834

Jeff Carruth
 Weycer Kaplan Pulaski & Zuber, P.C.
 24 Greenway Plaza, #2050
 Houston, TX 77046-2445

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Texas Commission on Environmental Qualit
 Reg. 6 Office Compliance Enforcement
 401 E Franklin Ave, Suite 560
 El Paso, TX 79901-1212

End of Label Matrix	
Mailable recipients	35
Bypassed recipients	0
Total	35